

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN THE MATTER OF:

AQUILUS RICKS,

Plaintiff,

v.

SOFITEL CHICAGO WATER TOWER,¹

Defendant.

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Case No.: 09CV7764

Judge Ronald A. Guzman

Magistrate Geraldine Soat Brown

DEFENDANT'S PROPOSED SCHEDULING ORDER

Pursuant to the Court's Standing Order, Fed. R. Civ. P. 16(b) and (c), Defendant submits the following proposed scheduling order for the Court's review and acceptance.

1. The parties have not held a Rule 26(f) conference.

Plaintiff is not represented by counsel.

Defendant is represented by:

Erin Dougherty Foley
Seyfarth Shaw, LLP
131 S. Dearborn, Suite 2400
Chicago, IL 60603

2. Initial Disclosures. The parties will complete by February 19, 2010.

3. Discovery Plan. Defendant proposes this discovery plan:

- a. Discovery will be needed on these subjects: Plaintiff's claim of race and color discrimination, Plaintiff's damages and Defendant's defenses.
- b. Defendant proposes a discovery cut-off of May 28, 2010.

¹ The proper name of Plaintiff's employer is not Sofitel Chicago Water Tower, but is La Touraine LLC.

- c. Maximum number of interrogatories by each party to another party, along with the dates the answers are made will be governed by the Federal Rules of Civil Procedure;
- d. Maximum number of requests for admission, along with the dates responses are to be made will be governed by the Federal Rules of Civil Procedure;
- e. Maximum number depositions by each party will be governed by the Federal Rules of Civil Procedures;
- f. Limits on the length of depositions to be governed by the Federal Rules of Civil Procedure;
- g. Dates for exchanging reports of expert witnesses – Defendant does not anticipate needing an expert at this time;
- h. Dates for supplementations under Rule 26(e) to be governed by the Federal Rules of Civil Procedure.

4. Other Items:

- a. Pretrial conference to be set at the Court's direction.
- b. The deadline for Plaintiff to amend pleadings or to join parties is February 19, 2010.
- c. The deadline for Defendant to amend pleadings or to join parties is February 26, 2010.
- d. Dispositive Motion deadline of June 30, 2010.
- e. Defendant is willing to engage in reasonable settlement discussions but does not presently believe alternative dispute resolution procedures would enhance settlement prospects;
- f. Final dates for submitting Rule 26(a)(3) witness lists, designation of witnesses whose testimony will be presented by deposition, and exhibit lists to be determined by this Court at the time of trial setting;
- g. Final dates to file objections under Rule 26(a)(3) to be determined by this Court at the time of the trial setting;
- h. The parties estimate the case to be ready for trial 60 days after ruling on any dispositive motion and estimate trial length to be three (3) day;
- i. There are presently no matters to be addressed.

DATED: February 4, 2010

Respectfully submitted,

LA TOURAIN LLC
(incorrectly named as
SOFITEL CHICAGO WATER TOWER)

By: /s/ Erin Dougherty Foley
One of Its Attorneys

Erin Dougherty Foley
SEYFARTH SHAW LLP
131 South Dearborn Street
Suite 2400
Chicago, Illinois 60603
(312) 460-5000
edfoley@seyfarth.com

CERTIFICATE OF SERVICE

The undersigned certifies that she has caused a true and correct copy of the foregoing
DEFENDANT'S PROPOSED SCHEDULING ORDER to be served upon:

Aquilus Ricks
8422 S. Kostner Avenue
Chicago, IL 60652

by electronic filing notification and United States Certified mailing this 4th day of February,
2010; and to:

Judge Ronald A. Guzman
Courtroom Deputy (Room 1218)
The Dirksen Federal Courthouse
219 S. Dearborn,
Chicago, Illinois 60603

by via hand delivery on this 4th day of February, 2009.

/s/ Erin Dougherty Foley